National Park Service
U.S. Department of the Interior

Grand Teton National Park
Wyoming

January 2004

McCollister Residential Complex
Adaptive Reuse of Historic Structures

Finding of No Significant Impact (FONSI)

FINDING OF NO SIGNIFICANT IMPACT
McCollister Residential Complex Adaptive Reuse of Historic Structures

On November 26, 2003 the National Park Service (NPS) released an Environmental Assessment/ Assessment of Effect (EA/AEF) on the adaptive use of historic structures currently located at, and that will be moved to or constructed at, the McCollister Residential Complex. The seven-acre McCollister Residential Complex is located in the east Antelope Flats portion of the park and is the former home of Paul W. McCollister who designed and planned the construction of the Teton Village and Jackson Hole ski area. Mr. McCollister lived on the property from the mid 1950s to 1965, at which point he rented it until 1999. Upon his death in 1999, ownership of the property transferred to the NPS. The McCollister Residential Complex (48TE1169) is eligible to the National Register for its association with the lives of persons significant in our past. The property has six contributing buildings, which consist of the main residence, two small cabins, a garage, a tack room, and a shed.

The primary purpose of the project is to preserve the historic structures at the McCollister Complex by adaptively using these structures. The secondary purpose is to provide employee housing. Grand Teton National Park has a critical need for employee housing. Without the availability of adequate housing, employees cannot be hired to carry out the mission of the park. The high cost of living in Jackson Hole makes it difficult to hire employees and provide for their housing. Concurrently, historic structures exist in the park which are unused and deteriorating. The decision to be made was whether and to what extent historic structures located at, moved to, or constructed at the McCollister Residential Complex should be adaptively used for seasonal housing for approximately 20 employees. Adaptive use of the site and structures would also entail updating the utility system and preserving the landscaping, consistent with the potential cultural landscape.

The EA/AEF was prepared to examine two alternatives: Alternative 1 – No Adaptive Reuse of Historic Structures (No Action Alternative) and Alternative 2 – Adaptive Reuse of Historic Structures (Preferred Alternative). One other alternative was considered, but rejected because it did not meet the project purpose and need. The EA was available for public review beginning on November 26, 2003 through January 5, 2004, which provided an opportunity for public input on the alternatives.

After careful review of impacts on cultural and natural resources and park operations, the preferred alternative has been selected for implementation. Topics of concern identified during scoping and evaluated in the EA/AEF included archaeological resources, potential cultural landscapes, historic structures, soils, vegetation, visual quality, wildlife including threatened or endangered species, and park operations.

Preferred Alternative (Alternative 2 in the EA)

The NPS has decided to implement the preferred alternative, which is the proposed undertaking for §106 compliance. Alternative 2 addresses the critical need to house seasonal employees and adaptively use historic structures in order to preserve them. It creates housing for approximately 20 seasonal employees and includes the following actions:

- Rehabilitate and use three of the six existing structures (the main residence and two cabins) to meet a portion of the housing need. Specific historic structure rehabilitation actions are outlined in Appendix A of the EA/AEF and the Errata portion of the FONSI.

- Place additional, residential buildings on the property in a manner that complements the potential cultural landscape. All new structures will be architecturally consistent with the existing structures. As part of this action, the NPS will continue consultation with the Wyoming State Historic Preservation Office (SHPO) and work on §106 matters. The SHPO concurred on January 21, 2004 that a determination of "no adverse effect" can be made with the placement of all the buildings within the general area outlined in the EA/AEF; however, further consultation as to their exact location and orientation within the approved area will conclude §106 compliance. The NPS and SHPO have formally agreed that consultation will take place before the final placement of all buildings to ensure no adverse effects to cultural resources.
- Adaptively use the garage building as storage for residents and the NPS.
- Upgrade existing electrical and telephone systems. Redevelop the well and construct a leach field.
- Develop adequate gravel parking for approximately 20 employees and several government vehicles.
- Provide for maintenance of the potential cultural landscape, including rehabilitation of the buck and rail fence. Develop pathways and minor landscaping consistent with the potential cultural landscape to meet resident needs.
- Restore and maintain species of native vegetation. Maintain fir trees by main residence and replace dead ones. Develop an aspen management plan for the area that includes propagation of additional trees and increases screening. An area of aspen and vegetation on the north, south, west and portions of the east sides of the property will remain undisturbed and serve as a visual buffer, screening the McCollister Residential Complex from much of Antelope Flats.

<u>Mitigation measures are a part of this alternative</u>:

1. Limit occupancy of the McCollister Residential Complex to seasonal use only, for the primary use season between mid-May and late September. A few employees may reside at the site a few weeks earlier or later.

2. Construction activities will be prohibited during the sage grouse breeding season (April to mid-May) during the daily display period (3 hours before sunrise and 3 hours before sunset) to protect sage grouse during leking activities at the Moulton lek.

3. Occupants of the McCollister Residential complex will not be permitted to have pets.

4. Restrict access and/or use of the surrounding sagebrush areas for a radius of one-mile by residents of the McCollister complex to protect sage grouse nesting and foraging habitat.

5. The existing electrical facilities within the McCollister Residential Complex are currently located underground but will require replacement to meet federal and state code requirements and provide an adequate power supply. If feasible, replaced and new lines will also be routed below grade. If lines are not placed underground, the NPS will comply with all measures suggested by the USFWS to the maximum extent possible. The electrical lines within the McCollister Residential Complex connect with the main power supply along a power line operated by Lower Valley Energy. The NPS will work with Lower Valley Energy to mitigate any possible impacts to birds by following appropriate measures.

6. Train all construction workers and residents in appropriate precautions and safety measures to use around black and grizzly bears. Human refuse and other attractants will be managed to prevent inadvertent feeding of wildlife. Bear-resistant dumpsters and garbage containers will be provided, emptied on a regular basis and food storage measures strictly enforced. All bear attractants will be stored and handled in a manner that minimizes potential bear-human conflicts. Landscaping will not include plant species highly palatable to bears. Additionally, no horses or other livestock will be kept at the complex at any time. This mitigation is intended to minimize the potential for human-bear and other wildlife conflicts.

7. Construction and rehabilitation zones will be identified and fenced with construction tape, snow fencing, or some similar material prior to any activity. The fencing will define the activity zone and confine activity to the minimum area required. All protection measures will be clearly stated in the construction and rehabilitation specifications and workers will be instructed to avoid conducting activities beyond the activity zone as defined by the zone fencing.

8. Re-vegetation plantings will use native species. Re-vegetation efforts will focus on reconstructing the natural spacing, abundance, and diversity of native plant species. All disturbed areas will be restored as nearly as possible to pre-construction conditions and/or documented historic conditions shortly after construction activities are completed.

9. In many areas soils and vegetation are already impacted to a degree by various human and natural activities. Construction will take advantage of these previously disturbed areas wherever possible. Vegetation impacts and potential compaction and erosion of bare soils will be minimized by conserving topsoil in windrows. The use of conserved topsoil will help preserve micro-organisms and seeds of native plants. The topsoil will be re-spread in as near to original location as possible, and supplemented with scarification, mulching, seeding, and/or planting with species native to the immediate area. This will reduce construction scars and erosion.

10. Should construction unearth previously undiscovered archaeological resources, work will be stopped in the area of any discovery and the park will consult with the State Historic Preservation Officer/Tribal Historic Preservation Officer and the Advisory Council on Historic Preservation, as necessary, according to §36 CFR 800.13, Post Review Discoveries. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed. The NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archaeological sites or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown archaeological resources are uncovered during construction.

11. Contractors will coordinate with park staff to reduce disruption in normal park activities. Construction workers and supervisors will be informed about the special sensitivity of park values, regulations, and appropriate housekeeping and wildlife management practices.

Environmentally Preferred Alternative

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). CEQ provides direction that "the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's § 101:

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
5. achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The preferred alternative (Alternative 2) is also the environmentally preferred alternative. Alternative 2 preserves historic structures and protects natural resources, while addressing the seasonal housing needs of Grand Teton National Park through the adaptive reuse of historic structures. It focuses on achieving a balance between natural and cultural resource impacts. Adaptive use of historic structures provides better protection and preservation than stabilization alone, described in the no action alternative, or Alternative 1. The preferred alternative attains the widest range of beneficial uses of the environment without degradation, enhances the quality of renewable resources, and achieves a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities. Alternative 2 meets all six national environmental policy goals and is the environmentally preferred alternative.

Other Alternatives Considered in the EA

Alternative 1 – No Action Implementing the no action alternative (Alternative 1) would result in the continuation of existing conditions at the McCollister Residential Complex. It would not remove existing uses, developments, or facilities and provides a basis for comparing the management direction and environmental consequences of the preferred alternative (Alternative 2). Under Alternative 1, the NPS would not take any actions or make any changes in course when responding to future needs and conditions associated with the McCollister Residential Complex.

The six buildings on the McCollister Residential Complex are eligible for listing in the National Register of Historic Places. Under the no action alternative, the buildings would not be adaptively used and would receive the minimal amount of preservation. Stabilization work would include placing boards over doors and windows, and installing a water-proof membrane on the roofs to keep the elements from furthering deteriorating some of the historic material. The initial cost to the NPS for the stabilization project is approximately $5,000 to $10,000. Additional funds would be needed in the future for continued stabilization. The garage would likely be used as a storage facility; however, no residential use would occur on the property. The buck and rail fence would be maintained as part of the potential cultural landscape, and the

property would receive hazardous fuels treatment (vegetation thinning) as part of Grand Teton National Park's fuels reduction project.

The hazardous fuels treatment objective in this area is to reduce/remove vegetation immediately adjacent to structures to limit fire extension from wildland fuels to structures. This includes removing most vegetation from around the foundation of buildings, overhanging trees and branches of any species or life form (trees or shrubs). Landscaping would optimize spacing and distribution using existing vegetation. Conifer seedlings and poles within the aspen stand would also be reduced. Hazardous fuels treatment will occur as part of Alternative 2 as well.

Other Alternatives Considered During the Planning Process but Dismissed

NPS considered, but dismissed one other alternative (scenario) that dealt with the adaptive use of the McCollister Residential Complex. This alternative proposed adaptively using only those three historic structures currently located at the complex and not relocating or constructing additional facilities on site. This alternative partially met the project's purpose and need, but was economically infeasible. Existing infrastructure and utilities would still require major upgrading and construction at a cost that would be too great to warrant housing for only 4-5 NPS employees.

Why the Preferred Alternative Will Not Have a Significant Effect on the Human Environment

Impacts that may be both beneficial and adverse:

The preferred alternative, Alternative 2, will not measurably impact ethnographic resources, museum collections, air quality, land use, natural lightscape, soundscape, prime and unique farmlands, water quality, wetlands, floodplains, wild and scenic rivers, wilderness, environmental justice, Indian trust resources, socioeconomics, or visitor use and experience. Furthermore, no known, adverse effects will occur to archaeological resources. Rehabilitation of three historic structures at the McCollister Residential Complex, using *The Secretary of the Interior's Standards for the Treatment of Historic Properties,* would have long-term, moderate beneficial impacts. Adaptive reuse will help preserve the buildings and continue their viability as housing. However, the construction of new interior walls would have long-term, minor, adverse impacts.

Impacts resulting from the construction and installation of utilities (septic, water, and electrical) and additional parking at the site would be mitigated through re-vegetation and rehabilitation resulting in short-term, minor, adverse impacts to soils, vegetation, the potential cultural landscape, visual quality, wildlife and park operations. To a degree, general landscape characteristics such as land use, views, and vegetation would be preserved. Some contributing features would be altered including the historic horse pasture, circulation system, and aspen grove with the addition of the proposed buildings. The landscape and viewshed would be improved through rehabilitation of the buildings and landscape, causing a long-term, minor, beneficial effect. However, the addition of new facilities/utilities on site will cause a short-and long-term, minor, adverse effect until re-vegetation grows in to restore the site to historical conditions. Therefore, both minor adverse and minor beneficial impacts to the potential cultural landscape, vegetation and visual quality in the long-term would occur as a result of these actions.

The project will have no effect on the bald eagle or Canada lynx. It may affect, but is not likely to adversely affect, the grizzly bear or gray wolf. The degree of impact to wildlife species due to increased human presence is unknown, but it is likely that the effects will be long-term, negligible to minor and adverse. There will be short- and long-term, negligible to minor, adverse effects to sage grouse and migratory birds.

Initial building rehabilitation and utilities installation will take place through a combination of park labor and contract work. In the short-term, these actions will have a minor, adverse effect on park operations. Facilities and utilities will require maintenance of water and septic systems, response to repairs, and continual maintenance of the historic structures. Impacts to operations will be short- and long-term, minor and adverse. The ability to provide housing for approximately 20 seasonal employees will have a long-term, minor to moderate, beneficial impact on park operations.

Degree of effect on public health or safety:

Adaptive use of the McCollister site for employee housing will increase the number of employees living in an area frequented by bison, potentially increasing the chance for human-bison conflicts and resultant injury. The Antelope Flats area provides the majority of summer range for bison, particularly in previously-burned areas. Much of the rut that occurs in Grand Teton National Park also takes place in this area. A bison wallow exists on the edge of the site, and previous residents are known to have provided salt licks to encourage bison to occupy the area, a practice which is strictly prohibited. Maintenance of the buck and rail fence around the McCollister Residential Complex will mitigate the potential for bison-human conflicts, as will education of residents regarding the dangers of wildlife. The risk of future human-bison conflicts resulting in a risk to public health and safety is considered negligible.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

No effects will occur to prime farmlands, wetlands, floodplains, wild and scenic rivers, or wilderness. The existing McCollister residences are located within an aspen community. The habitat surrounding the project area is a mix of vegetation types that includes sagebrush grasslands, and patches of aspen and conifers. Because these types occur in a mosaic of age classes and as a mix of vegetation types, the habitat the area provides is especially rich and diverse. The area supports a variety of wildlife species, but is particularly important for sage grouse, pronghorn antelope and bison. Elk and other ungulates also use the area as a migration corridor between seasonal ranges and find security in the forested patches while on the move.

The seven-acre McCollister Residential Complex is the former home of Paul W. McCollister who designed and planned the construction of the Teton Village and Jackson Hole ski area. The McCollister Residential Complex (48TE1169) is eligible to the National Register for its association with the lives of persons significant in our past. The preferred alternative has no known adverse effects to archaeological resources. Adaptive use of the Complex has both beneficial and adverse long-term impacts to the potential cultural landscape. Rehabilitation of three historic structures using *The Secretary of the Interior's Standards for Treatment of Historic Properties* will have long-term, moderate beneficial and adverse impacts.

Degree to which effects on the quality of the human environment are likely to be highly controversial:

The effects of the proposed action on the quality of the human environment are not expected to be highly controversial. The NPS provided copies of the scoping brochure and the environmental assessment to approximately 140 parties. In addition, the same information was available on the park's website, and local libraries and post offices. The park received a total of 19 comments on the scoping brochure and 16 on the environmental assessment, almost all of which were from the local area. The U.S. Fish and Wildlife Service concurred with the park's determination of the effects on threatened and endangered species. The SHPO concurred regarding the rehabilitation and adaptive use of the three historic residences currently located at the site. The NPS and the SHPO have agreed to further consultation regarding the eligibility of the potential cultural landscape, the placement and orientation of any additional buildings, and the location and design of parking areas.

Degree to which the possible effects on the human environment are highly uncertain or involved unique or unknown risks:

There were no highly uncertain, unique or unknown risks identified during either preparation of the EA/AEF or the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represent a decision in principle about future consideration:

The action for this project will not set any precedent for the National Park Service. The preferred alternative will not have significant effects, nor does it represent a decision in principal about any future consideration elsewhere in the National Park System.

Whether the action is related to other actions with individually insignificant scientific but cumulatively significant impacts:

As described in the EA/AEF, the preferred alternative will affect potential cultural landscapes, historic structures, soils, vegetation, visual quality, wildlife, and park operations. Ongoing projects within GTNP with potential impacts to the east Antelope Flats area include the Elk-Bison Management Plan, the Fire Management Plan, Fuels Reduction, the Transportation Plan, and the rehabilitation of infrastructure at the Teton Science School and adaptive use of the Hunter Hereford Barn.

The adverse impacts of the preferred alternative, in conjunction with beneficial and adverse impacts of other recently completed or reasonably foreseeable future actions, will result in both beneficial and adverse cumulative impacts on potential cultural landscapes, historic structures, soils, vegetation, visual quality, wildlife including threatened or endangered species, and park operations. The intensity of cumulative impacts will range from negligible to moderate, with both beneficial and adverse effects, with the exception of threatened or endangered (T&E) species. The cumulative effect of all these plans and actions combined will have a "may affect, not likely to affect" on T&E species. Cumulative effects for historic resources in the preferred alternative are beneficial and moderate in intensity due to the rehabilitation and adaptive use of the McCollister buildings. No individually insignificant but cumulatively significant impacts will occur to any resources as a result of this action in combination with all other actions planned.

Degree to which an action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural or historic resource:

The NEPA analysis conducted in the EA/AEF determined that the effects of the proposed action on cultural resources eligible for or listed on the National Register, or other significant scientific, cultural, or historic resources would range from short- and long-term, minor adverse effects to long-term moderate beneficial effects to historic structures and the potential cultural landscape. No effects would result to archeological resources. However, according to §106 compliance standards, the proposed action would have "no adverse effect" to cultural resources.

The SHPO concurred on January 21, 2004 that a determination of "no adverse effect" can be made with the placement of all the buildings within the general area outlined in the EA/AEF; however, further consultation as to their exact location and orientation within the approved area will conclude §106 compliance. The NPS and SHPO have formally agreed that consultation will take place before the final placement of all buildings to ensure no adverse effects to cultural resources.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:

In a letter dated December 29, 2003, the USFWS concurred with the NPS on its determination of "no effect" on the bald eagle and Canada lynx. Similarly the USFWS concurred with the determination of "may affect, but is not likely to adversely affect" on the grizzly bear and gray wolf. This concluded informal consultation between the NPS and USFWS. Mitigation measures, listed on pages 3 and 4 of the FONSI, are part of the informal consultation and will be followed to protect these species.

Whether the action threatens a violation of Federal, State or local environmental protection law:

This action violates no federal, state, or local environmental protection laws.

Impairment:

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the preferred alternative will not constitute an impairment to Grand Teton National Park's resources and values. This conclusion is based on an analysis of the environmental impacts described in the *McCollister Residential Complex Adaptive Reuse of Historic Structures EA/AEF*, the public and agency comments received, and the professional judgment of the decision-makers guided by National Park Service *Management Policies 2001*. While the preferred alternative has long-term, minor adverse impacts to the potential cultural landscape, historic structures, vegetation, visual quality, wildlife, and park operations, it also has long-term, minor beneficial impacts to the potential cultural landscape, historic structures, vegetation and park operations. The project would have short-term, minor adverse affects on soils, vegetation, and park operations. There would also be long-term, beneficial moderate effects to historic structures and park operations. Overall, the project has no major, adverse impacts that would have the potential to cause impairment of park's resources or values.

Public Involvement

The public scoping process for the East Antelope Flats project began in April 2003, with the NPS seeking public comment on issues, alternatives, concerns and other considerations regarding the proposal. Both a news release and a scoping notice describing the proposed action were issued on April 24, 2003 and mailed to approximately 140 parties. The American Indian tribes traditionally associated with the lands of Grand Teton National Park were apprised of the proposed action on May 1, 2003.The *Jackson Hole Daily* published articles on the proposal on April 30 and May 7, 2003. Comments were accepted through May 27, 2003, and a total of 19 were received.

During the scoping period, several local and state agencies and members of the public expressed concern about the adverse effect of relocating the Hunter Hereford Barn. The NPS decided that more time was needed to adequately address public comment and consider the adverse effect of relocating the Hunter Hereford Barn through further consultation with the SHPO. Because the NPS did not wish to delay a decision on the adaptive use of the McCollister Residential Complex, the NPS divided the project into two separate EAs.

The *McCollister Residential Complex Adaptive Reuse of Historic Structures EA/AEF* was available for public review beginning on November 26, 2003 through January 5, 2004. Approximately 160 copies of the EA/AEF were mailed to government agencies, private organizations, and individuals identified during the scoping and planning processes. The *Jackson Hole News & Guide* published an article about adaptive use of the property on December 3, 2003. The document was also posted on the Internet at the government Web site (www.nps.gov/grte/plans/planning.htm), and copies were available in the Moose Visitor Center, the Superintendent's Office, and the Teton County Library. A press release was issued to local media. In response the park received sixteen (16), written comments from government agencies, private organizations and individuals who had a number of comments, which resulted in several changes to the EA/AEF. The NPS also responded to substantive comments in the errata sheets. The FONSI and errata sheets will be sent to everyone who commented on the EA.

CONCLUSION

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Most of the adverse environmental impacts that would occur are negligible to minor in intensity and primarily short-term. There are no significant or unmitigated adverse impacts on public health or safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended by: Ralph H. Tingey

Ralph H. Tingey, Acting Superintendent
Grand Teton National Park

Jan 30, 2004
Date

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Approved by:

Stephen P. Martin
Director, Intermountain Region
National Park Service

2/2/04
Date

Errata Sheet
McCollister Residential Complex
Adaptive Reuse of Historic Structures EA/AEF
Grand Teton National Park

The park received 16 comment letters from federal, state and county agencies, as well as citizens and organizations during the public comment period for the EA/AEF. Many of these comments did not require a change in the text of the EA/AEF; however, those that did are reflected in the *Changes in the Environmental Assessment/Assessment of Effect* text section below. The *Responses to Comments* section provides replies to comments that required clarification or explanation. The combination of the EA/AEF and the errata sheets form the complete decision notice on which the FONSI is based.

CHANGES IN THE ENVIRONMENTAL ASSESSMENT/ASSESSMENT OF EFFECT

Page 13, second paragraph: After the fourth sentence, add: "The remaining two buildings, the shed and the tack room, will be stabilized and not used."

Page 23, **first paragraph:** After the second sentence, add: The boundary of this property is a rectangle that encloses the entire complex, with the access road providing the eastern side of the rectangle. This boundary includes all historic structures associated with the McCollister complex except for the remains of the buck and rail fence that are scattered and incomplete, although a few sections are included in the boundary.

Page 23, end of paragraph: At the end of the paragraph, add: In the mean time, the site boundary is considered to be the same as the potential potential cultural landscape boundary, coinciding with the boundary of the historic district. The buck and rail fence marks this boundary. Maps 1 and 2, on pages 12 and 15 respectively, show the potential potential cultural landscape boundary as the site boundary.

Pages 46 and 47: Add the following citations to the References in alphabetical order:

Connelly, J. W., M. A. Schroeder, A. R. Sands, and C. Braun. 2000. *Guideline to Manage Sage Grouse Populations and Their Habitats*. Wildlife Society Bulletin 28: 967-985.

Hamann, B., H. Johnston, P. McClelland, S. Johnson, L. Kelly and J. Gobielle. 1999. pp 3.1-3.34 in G. Joslin and H. Youmans (coordinators). *Effects of Recreation on Rocky Mountain Wildlife: A review for Montana. Committee on Effects of Recreation on Wildlife*, Montana Chapter of the Wildlife Society.

Holloran, M., Anderson, S. and B. Holtby. 2002. *Sage Grouse Seasonal Habitat Use and Survival in Jackson Hole, Wyoming*. Unpublished progress report.

Knight, R. L. and D. N. Cole. 1995. Factors That Influence Wildlife Responses to Recreationists pp. 71 - 80 in R. L. Knight and K. J. Gutzwiller (eds.). *Wildlife and Rcereationists: coexistence through management and research*, Island Press, Washington, DC.

Wyoming Greater Sage Grouse Working Group. 2003. W*yoming Greater Sage Grouse Conservation Plan.* Unpublished report, Wyoming Game and Fish Department, Cheyenne, WY

RESPONSE TO COMMENTS

1. ***The McCollister Cabins should be relocated to another site in the park and housing clustered in other already developed areas.***

   Relocation of the cabins away from their historic setting would destroy the contextual integrity of the structures and constitute an adverse effect to cultural resources. This would be contrary to the purpose and need for the action.

2. ***Only the three cabins that are currently present on the McCollister site should be adaptively used as housing. No additional structures should be placed at this site.***

   In order to adaptively reuse the three cabins for seasonal employee housing, it will be necessary to upgrade the utility systems and other infrastructure. It would be economically and operationally impractical to do this for the small number of employees that could be housed in the three existing structures. The addition of a limited number of buildings to the site will provide for a suitable economy of scale.

3. ***The park should meet its needs for employee housing by using already developed areas of the park, or by developing housing outside of the park.***

   The park is addressing its critical employee housing needs through a variety of strategies, including the construction of additional housing within already developed areas of the park and by leasing residential units in Jackson. It is not financially or operationally feasible for the park to meet all of its employee housing needs in this way because of constraints on further development in currently developed areas and the prohibitively high cost of real estate outside the park. In addition, the park recognizes that the lack of available housing in and near Jackson is also a serious concern for the Town and the County.

4. ***Use of the McCollister site for employee housing is inappropriate because it is located in a "Class III" land category as described in the 1976 Master Plan.***

   The adaptive reuse of the McCollister site is compatible with the Class III land designation as described on page 15 of the 1976 Master Plan. Low density use, combined with proper mitigation and management has little impact on ecological processes and therefore does not conflict with management of Class III lands.

5. ***Residential use of the McCollister site was to be discontinued at the time of Paul McCollister's death.***

   The NPS acquired the McCollister property under the terms of a life estate, which allowed Mr. McCollister or others that he designated to occupy the site during his lifetime. Upon his death, full possession of the property passed to the NPS; however, the tenants continued living on the property for approximately half a year under a special use permit. The method by which the NPS acquired the property does not constrain the park from preserving the structures through adaptive reuse as employee housing.

6. ***Both the grizzly bear and the grey wolf, both listed as threatened under the Endangered Species Act, use habitat in proximity to the McCollister site. The NPS should not develop an employee housing area here because of potential conflicts with these species.***

The U.S. Fish and Wildlife Service, in a letter date December 29, 2003, concurred with the NPS' determination that the action "may affect, but is not likely to affect" grizzly bear and grey wolf. The NPS will implement mitigation actions as described in the environmental assessment/assessment of effect.

7. *The McCollister site is located in an area that is important for many species of wildlife and therefore should not be used for employee housing.*

The McCollister site is located within an aspen community. The habitat surrounding the project area is a mix of vegetation types that includes sagebrush grasslands and patches of aspen and conifers. Because these types occur in a mosaic of age classes and as a mix of vegetation types, the habitat the area provides is especially rich and diverse. The area supports a variety of wildlife species, but is particularly important for sage grouse, pronghorn antelope, and bison. Elk and other ungulates also use the area as a migration corridor between seasonal ranges and find security in the forested patches while on the move. Habitats adjacent to the project area provide suitable fawning and calving habitat for pronghorn antelope and bison, which use the area throughout the spring, summer, and fall.

The potential impact of adaptive reuse of the McCollister site on wildlife species is related to the type, intensity, duration, timing (e.g. breeding season, wintering period, etc.), predictability, and location of all the activities involved in the action and the sensitivity of each species to these activities (Knight and Cole 1995). In general, those actions that occur during sensitive life stages (e.g. during breeding season) or in or near habitats that are limited in occurrence or extent (e.g. lek or nest sites), or result in the direct loss or fragmentation of important habitats place individuals and populations at greater risk. When spatial and temporal overlap of human activities and important wildlife habitats/sites and sensitive life stages are minimized, the risks are reduced.

The action involves rehabilitation of several extant structures as well as construction or placement on site of a limited number of buildings that are of similar size and character, as well as upgrading utility systems and parking. Once complete, the area will provide seasonal housing for up to about 20 employees, with an occupancy period of generally mid-May to late September. A few employees may be on site several weeks earlier or later. Impacts on wildlife will be minimized through a variety of strategies. These will include educating employees about the types of wildlife that use the area, precluding or limiting the use by employees of areas beyond the immediate site, and not allowing activities that are incompatible with wildlife use of the area. In addition, the park will monitor the effects of the residential use on wildlife and may adjust the length of seasonal occupancy and/or the number of occupants in order to ensure that wildlife is not adversely affected.

8. *The NPS should follow the habitat protection measures described by Connelly et. al. (2000) to protect Sage Grouse habitat within 3 miles of an occupied lek.*

Habitat requirements for sage grouse vary seasonally, with distinct needs during the breeding and winter seasons. Breeding habitats include those used for lek attendance, nesting, and brood-rearing, and their presence in a healthy condition is critical to the persistence of sage grouse populations (Connelly et al. 2000).

Within Grand Teton, there are three known occupied lek sites: Moulton, Airport, and Timbered Island. The Timbered Island site was discovered in the spring of 2003, thus no trend

data is available. Historically, eight lek sites were occupied in the park. The park has monitored grouse attendance at lek sites since 1986. Attendance at the Moulton lek has declined from a high of 91 males in 1989 to a low of 21 males in 1999. Based on the last six years of monitoring data, male attendance rates appear stable, but low. Park-wide, male attendance shows a similar trend. The number of males attending leks peaked in the early 1990's with 199 grouse observed, but has since declined. An average of 46 males was observed at the Airport and Moulton leks between 1999 and 2003. Male attendance rates have been highest at the Moulton lek in comparison to the Airport lek since the mid 1990's. Holloran (2002) reported that the Jackson Hole sage grouse population has experienced a 63 percent decline since 1995, based on maximum counts of males at lek sites. He estimated that the current population is 400 percent below the peak recorded in 1950. The current population is estimated at 175 individuals. No likely causes for the observed decline in sage grouse have been identified.

The Moulton lek is within one mile of the project area. The closest sage grouse nesting habitat is approximately one-half mile west of the project area in sagebrush that was not affected by the 1994 Row fire. Fire in sagebrush habitat tends to stimulate growth of forbs in the understory. Currently, the sagebrush habitats immediately adjacent to the project area are good quality foraging habitats as a result of the Row fire. As the sagebrush within the burn area matures, the area will again become suitable nesting habitat, but this may take up to 30 years depending on the rate of sagebrush growth and reestablishment.

Little research is available that directly addresses the effects on sage grouse of residential development and associated dispersed recreational use of adjacent areas. Nevertheless, some assessment of potential impacts is possible based on logic and general principles of conservation biology. In general, larger, well distributed populations are more resilient than smaller populations with fewer segments. This is because small populations have low genetic variability, high susceptibility to random environmental events, and are impacted more by high variability in birth or death rates. Compared to historical numbers, the sage grouse population is low and there are fewer active lek sites. Consequently, the remaining sites take on greater importance for persistence of the species within the park.

Residential development and surface occupancy of sites within sage grouse breeding habitats has been identified as a risk factor to sage grouse. Lek sites are the focal point for grouse management because they are used traditionally, limited in occurrence, and because a high percentage of females nest within close proximity (three miles) of the lek where they were bred (Hamman et al. 1999, Wyoming Greater Sage Grouse Conservation Plan 2003). Connelly et al. (2000) recommended that where sagebrush is not distributed uniformly and non-migratory populations occur---the situation within Grand Teton---habitat should be protected within three miles of an occupied lek. The primary concerns related to residential developments in these habitats are related to increased road use and traffic volume, fencing, power lines, human activity, and the presence of cats and dogs. Waste disposal is also a concern. If not stored properly, garbage could attract predators and lead to an increase in predator populations.

The McCollister site is located within one mile of the Moulton lek. While use of the McCollister property will not directly impact the lek site or remove any sage grouse habitat, it will increase residential use in an area adjacent to sage grouse breeding habitat. However, use of the McCollister site for residential use will be strictly limited in scale, with little or no potential for future development projects in suitable habitat within a three mile radius of the lek. The project will not involve any new road construction, although it will slightly

increase the amount of traffic on the Antelope Flats Road during the period of seasonal occupancy. The effect of this is unknown however it is likely very small.

Adaptive reuse of the McCollister site does constitute an increase in residential use and development within a three mile radius of an occupied lek site. However, the limited scope and footprint of the action, in combination with strict management and mitigation measures, is not expected to adversely affect sage grouse. The NPS is addressing the USFWS habitat protection measures by applying management and mitigation measures as described in the environmental assessment/assessment of effect and FONSI.

9. *The SHPO expressed concern over the source, number of, and siting of the re-located buildings and newly constructed buildings; and the eligibility of the potential cultural landscape.*

During preliminary consultation with the park's appointed SHPO representative in the fall of 2003 on the effects of the proposal to the potential cultural landscape, both parties agreed that the initial bubble design for both relocated and newly constructed buildings was a workable concept, as long as NPS would continue consulting with the SHPO as more detailed plans developed and the placement and orientation of buildings was known. During the public comment period for the EA/AEF, a different representative from the SHPO wrote a letter to the NPS on December 18, 2003 and addressed a number of concerns with parking; the source, number and location of pre-constructed buildings; as well as other potential impacts to the potentially eligible potential cultural landscape.

The buildings that are to be moved to the site will be obtained through a private donation and are not currently NPS property. These buildings are consistent with the character of the existing McCollister buildings. If additional buildings were to be added to the site, consistent with the EA/AEF and FONSI in order to accommodate up to 20 employees, the NPS would consult with the SHPO in order to ensure that they are consistent with the site's character.

The NPS held a telephone conference with both representatives of the SHPO on January 9, 2004 to provide clarification and discuss these matters. As a result of this telephone call, the SHPO concurs with the concept of the plan and acknowledges that NPS will continue to work with them and on §106 matters to ensure there are no adverse effects to cultural resources. The NPS and SHPO will maintain ongoing consultation and work on §106 matters to ensure there are no adverse effects to cultural resources, including the eligibility of the McCollister Residential Complex potential cultural landscape. This assurance was provided in the EA/AEF document on page 23 in the first paragraph.

10. Parking is not identified as an issue and concern and it does not take into account Park vehicles or second vehicles owned by those residing on site.

The NPS identifies issues and concerns by potential resource effects. Parking to accommodate up to 20 employees is addressed within the vegetation section for *Affected Environment and Environmental Consequences* on page 32 of the EA/AEF. In response to second vehicles for employees, seasonal employees rarely have a second vehicle and many times do not have one vehicle. Therefore, as a rule of thumb, the NPS estimates one vehicle per seasonal employee.